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Attorneys for Plaintiff
United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

JESUS AGUILAR-MENDOZA,

Defendant.

CASE NO. 2:24-CR-00202-DJC

STIPULATION REGARDING EXCLUDABLE
TIME PERIODS UNDER SPEEDY TRIAL ACT;
FINDINGS AND ORDER

DATE: May 22, 2025
TIME: 9:00 a.m.
COURT: Daniel J. Calabretta

STIPULATION

Plaintiff United States of America, by and through its counsel of record, and defendant, by and through defendant's counsel of record, hereby stipulate as follows:

1. By previous order, this matter was set for status on May 22, 2025.
2. By this stipulation, defendant now moves to continue the status conference until August 7, 2025, at 9:00 a.m., and to exclude time between May 22, 2025, and August 7, 2025, under Local Code T4.
3. The parties agree and stipulate, and request that the Court find the following:
 - a) Counsel for defendant sought the government's assistance in obtaining certain materials potentially helpful to defense's case. The government has endeavored to obtain the materials, and anticipates production of those materials in the coming weeks. In order to allow for the production of the requested materials and to provide defense counsel sufficient time to review them, a continuance of the status conference is requested.

1 b) The government has represented that the discovery associated with this case
2 includes investigative reports and related documents exceeds 1000 pages of documents. All of
3 this discovery is in the process of being produced directly to counsel and/or made available for
4 inspection and copying.

5 c) Counsel for defendant desires additional time to consult with his client, review the
6 current charges, conduct investigation and research related to the charge, review and copy
7 discovery for this matter, discuss potential resolutions with his client, and otherwise prepare for
8 trial.

9 d) Counsel for defendant believes that failure to grant the above-requested
10 continuance would deny him/her the reasonable time necessary for effective preparation, taking
11 into account the exercise of due diligence.

12 e) The government does not object to the continuance.

13 f) Based on the above-stated findings, the ends of justice served by continuing the
14 case as requested outweigh the interest of the public and the defendant in a trial within the
15 original date prescribed by the Speedy Trial Act.

16 g) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,
17 et seq., within which trial must commence, the time period of May 22, 2025 to August 7, 2025,
18 inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4]
19 because it results from a continuance granted by the Court at defendant's request on the basis of
20 the Court's finding that the ends of justice served by taking such action outweigh the best interest
21 of the public and the defendant in a speedy trial.

22 4. Nothing in this stipulation and order shall preclude a finding that other provisions of the
23 Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial
24 must commence.

25 IT IS SO STIPULATED.
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1 Dated: May 19, 2025

MICHELE BECKWITH
Acting United States Attorney

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3 /s/ ZULKAR KHAN
ZULKAR KHAN
Assistant United States Attorney

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5 Dated: May 19, 2025

6 /s/ HOOTAN
BAIGMOHAMMADI
7 HOOTAN
BAIGMOHAMMADI
8 Counsel for Defendant
Jesus Aguilar-Mendoza

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10
11 **ORDER**

12 IT IS SO FOUND AND ORDERED this 19th day of May, 2025.

13
14 /s/ Daniel J. Calabretta
15 THE HONORABLE DANIEL J. CALABRETTA
16 UNITED STATES DISTRICT JUDGE